

April 21, 2018

Dear Administrator Pruitt,

Thank you for your service to our great country. My name is Chris Spence, and I am the Chief Financial Officer for Spartan Mosquito, a Mississippi based manufacturer located in the town of Laurel. This week while on a trade mission to Dublin and London I was afforded the opportunity to speak with our mutual friend, Mississippi Governor Phil Bryant, about some setbacks our company is experiencing with unnecessary regulatory hurdles. After I explained our company's problem to Governor Bryant, he said that I should compose the subject letter to summarily encapsulate what he and I discussed in hopes that we would be able to obtain a waiver, or similar document, from your Environmental Protection Agency. In full respect of your limited time, I will try to be concise and offer a brief overview of our company and situation.

The founders of our company, Jeremy Hirsch and Chris Bonner, spent roughly three years in research and development creating an innovative and much more effective way to kill the mosquito. The company was officially formed in 2016 (AC2T Inc. dba Spartan Mosquito), and it was decided that 2017 would be the year that we would bring the product to market. Our goal was to effectively educate the public on what makes our product (and corresponding technology) different. We hoped to define first year market success by selling 2,500 units in FY17. By December of FY17, we had already sold over 50,000 units and had purchase orders for over 600,000 more units in 2018. By this time, we had already turned down many of the big box stores including Wal-Mart, Lowe's, Walgreens, and CVS, among others. We were also contacted by two different members associated with the TV show "Shark Tank". By February 2018 we had turned down over 43,000 stores nationwide and announced that we would be entering 54 countries in FY19. Over this same period, we outgrew almost every member of our supply chain and our warehouse in Hattiesburg, requiring us to move to a new 60,000 square foot warehouse in Laurel. Suffice it to say, we have been growing.

However, with extraordinary growth comes extraordinary challenges. One such challenge has been with the EPA. The EPA has struggled with understanding our product as we don't fit into their existing classification framework or regulatory guidelines. It took years of research and discussion with the EPA just to get approved for domestic manufacturing and consumption of our initial product. This was largely because we are extremely effective at killing the mosquito (over 95% die in the treatment area for up to three months), yet we use no toxic ingredients. They didn't see how it could be possible, and some of their senior entomologists debated us on the underlying science of our product – despite the treasure trove of data we were able to provide. Email and phone discussions with Justin Mullenix (EPA Region 4), Sherada Hobgood (Conventional Chemicals Registration Ombudsmen for the EPA's Registration Manual), and others were unable to provide timely results. So, after working with numerous members of state and federal government, we escalated our problems all the way to the White House where we received the following letter from President Trump himself (see Exhibit A).

In order to continue growing our business and create more jobs for MS, we need to be able to add an additional ingredient to our product – boric acid. While the lay person may hear the word "acid" and become apprehensive, existing scientific data shows that, in terms of toxicity, one of the closest things on the planet to boric acid is Sodium Chloride (table salt). If we could add this one extra ingredient to our product, we would be able to kill all 3,500 species of the mosquito worldwide, including those carrying the deadliest mosquito-borne diseases such as Malaria, Dengue, Yellow Fever, West Nile Virus, and Zika Virus. We are continually contacted by other countries across the globe asking for the new version of our product; but the problem we have is that we will be forced to leave the US in order to manufacture what they need as the EPA will not grant permission (in a timely manner) for us to add an extremely low dose of boric acid to our product. And by "low", permit me to put this word into context. We need to add less boric acid

than levels of boron found in Silly Putty, eyewash, or a tube of lipstick (see Exhibit B). Currently the EPA is insisting that they need us to start all over with a new registration process for this modified version of our product (meaning they need over \$250,000 from us and 18 to 30 months to research our request) – which is absolutely unnecessary when one considers the sheer decades of data the EPA already has on boric acid efficacy and safety. Even the EPA's very own "R.E.D. Facts" document on Boric Acid concluded, "The use of currently registered pesticide products containing boric acid and its sodium salts in accordance with approved labeling will not pose unreasonable risks or adverse effects to humans or the environment." (See Exhibit C). In a globally competitive pesticide market we truly cannot stay on the sidelines for two or three years in order to prove the same scientific conclusions that the EPA has already reached.

Mr. Pruitt, we know that you have a reputation for cutting through excessive and redundant regulatory restriction within the EPA and we are absolutely confident that if we could get 30 minutes of your time we could provide ample enough evidence and data to show that a single waiver from the stroke of your pen could add at least 200 jobs to Mississippi in the next 24 months. A waiver that would grant Spartan Mosquito the ability to manufacture our latest product for both domestic and international consumption would guarantee we could keep our operations in the US and not force us to leave due to unnecessary bureaucratic hurdles.

We would be eternally grateful for anything that you or your office could do to help us with the current regulatory stalemate we are experiencing in Mississippi. Please don't hesitate to ask for any additional information you may need from me in order to corroborate the claims I have made about our company and/or our encounters in my letter. If you would be so gracious to meet with us in DC (or anywhere you request for that matter), simply name the date and our CEO, a senior member of our science team, and myself will be on a plane as soon as you prefer.

With Sincerest Gratitude,

Chris Spence